

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Mail Processing Network Rationalization
Service Changes, 2012

Docket No. N2012-1

AMERICAN POSTAL WORKERS UNION, AFL-CIO,
MOTION FOR ADDITIONNAL ACCESS TO
NON-PUBLIC INFORMATION IDENTIFIED
AS USPS-LR-N2012-1/ NP1, NP2, NP3, NP4, NP5, NP6, NP7,
NP8, NP10, NP11, NP12, NP14, NP15, NP16, NP17
(March 19, 2012)

Various representatives, attorneys and consultants of the American Postal Workers Union, AFL-CIO (APWU) have been granted access to USPS-LR-N2012-1/ NP1, NP2, NP3, NP4, NP5, NP6, NP7, NP8, NP10, NP11, NP12, NP14, NP15, NP16, NP17. Given the large volume of information provided and the need to utilize additional staff to organize the materials, APWU hereby seeks access to this non-public material on behalf of Ms. Barbara Zibordi, a Paralegal at O'Donnell, Schwartz & Anderson, P.C.

APWU counsel has conferred with the Postal Service counsel and has been assured that the Postal Service has no objection to Ms. Zibordi accessing this information.

The necessary certification for each non-public library reference has been completed for Ms. Zibordi and a copy of each Certification is attached hereto.

APWU respectfully requests that the above named individual be granted immediate access to the non-public Library References USPS-LR-N2012/1NP1-8, 10-12, 14-17.

Persons identified by the Postal Service pursuant to Section 3007.2(c) have been provided with a copy of this Motion and accompanying certifications today by email.

Respectfully submitted,

Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO